

Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
Tel. +1.215.963.5000  
Fax: +1.215.963.5001  
www.morganlewis.com

**Morgan Lewis**

**Steven A. Reed**  
Partner  
215.963.5603  
sreed@morganlewis.com

March 25, 2015

**VIA ECF AND ELECTRONIC MAIL**

Honorable Andrew L. Carter, Jr.  
Thurgood Marshall U.S. Courthouse  
40 Foley Square, Room 435  
New York, NY 10007  
E-mail: [ALCarterNYSDChambers@nysd.uscourts.gov](mailto:ALCarterNYSDChambers@nysd.uscourts.gov)

**Re: In re North Sea Brent Crude Oil Futures Litig., No. 1:13-MD-02475 (ALC)**

Dear Judge Carter:

We represent Defendants Shell International Trading and Shipping Company Limited (“STASCO”) and Shell Trading US Company (“STUSCO”) in the above-captioned multi-district litigation. We write on behalf of our clients and with the consent of counsel for the Brent Derivative Trader Plaintiffs (“Trader Plaintiffs”), seeking a modest adjustment to the schedule set forth in Paragraph 9 of the Court’s Stipulation and Order (ECF No. 307) for the submission of the supplemental motion to dismiss brief of STASCO and STUSCO, the Trader Plaintiffs’ opposition, and STASCO/STUSCO’s reply.

As Your Honor will recall, the Trader Plaintiffs in October 2014 requested permission from the Court for leave to file a motion to amend their Complaint in this action to, among other things, join STASCO as a party to the case. (See ECF No. 262). After extensive negotiation among counsel for the Trader Plaintiffs and the undersigned, a stipulation was reached pursuant to which STASCO would be substituted for Royal Dutch Shell, plc as a defendant in the case, but otherwise, the substantive allegations of the existing pleading would remain largely the same in order to avoid the delay and burden on the Court of an additional round of motions to dismiss. While allowing the existing motion to dismiss briefing to remain largely intact, the stipulation did, however, provide in Paragraph 9 that within 30 days of its entry as an Order by the Court STASCO and STUSCO would jointly file a short supplemental motion to dismiss to address the allegations as to them in the Second Amended Complaint and to raise a jurisdictional challenge as to STASCO, the Trader Plaintiffs would be allowed to file an opposition 14 days thereafter, and STASCO/STUSCO would file a reply seven days later. After holding an in-person

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conference with the parties, the Court so-ordered the stipulation on February 26, 2015 (ECF No. 307) thus implementing this supplemental briefing schedule.

By way of this letter, STASCO and STUSCO respectfully request additional seven days to submit their joint supplemental brief, and the Trader Plaintiffs have no objection, but respectfully request that their opposition brief be due on April 24, 2015, to avoid conflicting deadlines in another case. The extension requested herein, if approved, would result in the following schedule for the supplemental briefing contemplated by Paragraph 9 of the Stipulation and Order:

Submission	Current Deadline	Extended Deadline
STASCO/STUSCO Supplemental Brief	March 30, 2015	April 6, 2015
Trader Plaintiffs' Opposition	April 13, 2015	April 24, 2015
STASCO/STUSCO Reply	April 20, 2015	May 1, 2015

No prior extensions of these deadlines have been sought.

Respectfully submitted,



Steven A. Reed

SAR/deb

cc: All counsel of record via ECF